

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
CAMDEN VICINAGE**

**IN RE: VALSARTAN,  
LOSARTAN, AND  
IRBESARTAN PRODUCTS  
LIABILITY LITIGATION**

**This Document Relates to All  
Actions**

MDL No. 2875

Honorable Robert B. Kugler,  
District Court Judge

**NOTICE OF ZHP DEFENDANTS’  
MOTION TO SEAL PURSUANT TO  
L. CIV. R. 5.3**

**ORAL ARGUMENT REQUESTED**

**TO: ALL COUNSEL OF RECORD**

**PLEASE TAKE NOTICE** that at the mid-September 2023 status conference with Special Master Hon. Thomas I. Vanaski (Ret.), or on such earlier date as set by the Court, Skadden, Arps, Slate, Meagher & Flom LLP, attorneys for Zhejiang Huahai Pharmaceutical Co., Ltd., Huahai U.S., Inc., Princeton Pharmaceutical Inc., and Solco Healthcare U.S., LLC (collectively, the “ZHP Defendants”), shall move for an Order pursuant to L. Civ. R. 5.3(c) permitting the filing of a redacted version of the following document previously submitted *in camera* for the Court’s review:

- (i) Exhibit 2 to Plaintiffs’ Brief in Support of *Daubert* Motion to Preclude the Opinions of Defense Expert Fengtian Xue, Ph.D. (ECF No. 2288-3).

**PLEASE TAKE FURTHER NOTICE** that in support of this motion, the ZHP Defendants will rely upon the Certification of Christopher Cox, which contains a Consolidated Index In Support Of Motion To Seal, the Declaration of Jucai Ge, the ZHP Defendants' Memorandum Of Law In Support Of Motion To Seal, and all other pleadings and memoranda on file in this matter.

**PLEASE TAKE FURTHER NOTICE** that the ZHP Defendants submit a proposed form of Order with proposed findings of fact and conclusions of law herewith.

Dated: July 20, 2023

Respectfully submitted,

By: /s/ Jessica Davidson

Jessica Davidson (DC Bar No. 457021)  
(Admitted to Practice in Maryland and the  
District of Columbia; Not Admitted in New  
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Prinston Pharmaceutical Inc., and Solco  
Healthcare U.S., LLC*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on July 20, 2023, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all CM/ECF participants in this matter.

/s/ Jessica Davidson

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(Admitted to Practice in Maryland and the  
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